

45D11-2209-CT-000912

Lake Superior Court, Civil Division 7

Filed: 9/12/2022 4:48 PM

Clerk

Lake County, Indiana

STATE OF INDIANA) IN THE LAKE CIRCUIT/SUPERIOR COURT
)
)
COUNTY OF LAKE)
)
)
FELICIA PERRY)
)
)
vs.)
)
BLOOMIN' BRANDS/) CAUSE NO:
)
OUTBACK STEAKHOUSE)

COMPLAINT FOR DAMAGES

Felicia Perry by Counsel, Eric Oden Clark says as follows for her complaint against Bloomin' Brands /Outback Steak House :

1. On or about December 13, 2020, plaintiff Felicia Perry went to Outback Steak House located at 1590 E. Lincoln Highway Merrillville Indiana 46410, Lake County Indiana, at approximately about 1:30 p.m.
2. Thereafter she went to the women's restroom to wash her hands;
3. While attempting to wash her hands she noticed water on the floor.
4. Since she was unable to get the faucet to work at the sink where she was standing, she reached over to the sink that had puddle of water on the floor in front of it;
5. After washing her hands she decided to use the toilet and thereafter returned to the sink to wash her hands after using the toilet;
6. Thereafter while avoiding the puddle that was still on the floor she slipped and fell on water that was additional water on the floor injuring her back and arm;
7. Thereafter Felicia pulled herself up from the floor and made a report to the manager;
8. That the restaurant called an ambulance and Felicia was transported the Methodist Hospital;
9. That outback Steak House had a duty to Felicia to maintain its premises in a reasonably safe condition;
10. That Outback Steak House either knew or should have known of the condition of the floor in the women's bathroom;

11. That a failure to maintain the premises in a reasonably safe condition and allowing water to accumulate due to negligence and was as the responsible cause for Felicia's fall there by breaching it's duty to Felicia Perry;
12. As the direct and proximate/responsible of Outback's negligence, Plaintiff, Felicia Perry suffered injuries, some of which may be permanent, endured physical and mental pain, incurred medical expenses and loss of wages.

WHEREFORE, Plaintiffs demand judgment against Defendant, Bloomin' Brands/Outback Steakhouse, for reasonable compensatory damages; for compensation for pain and suffering and all other just and proper relief.

/s/Eric O. Clark

Eric Oden Clark, #3926-45

Attorney for Petitioner

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Plaintiff respectfully demands trial by jury.

/s/Eric O. Clark

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